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5 Attorneys for Defendants Mark Lane, Capitol  
Motion Pictures, LLC, Fully Attired Film Group,  
6 LLC, Fully Attired Film Group, LP and Full  
Circle Productions, LP  
7

8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**  
10

11 SUSAN SHALOV,

12 Plaintiff,

13 v.

14 MARK LANE; CAPITOL MOTION  
PICTURES, LLC; FULLY ATTIRED FILM  
15 GROUP, LP; FULL CIRCLE  
PRODUCTIONS, LP; and DOES 1-50,  
16 inclusive,

17 Defendants.  
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CASE NO. 10CV0474H

**STIPULATION EXTENDING TIME FOR  
DEFENDANTS TO RESPOND TO  
COMPLAINT FOR BREACH OF  
CONTRACT, CONVERSION, UNJUST  
ENRICHMENT, FRAUD AND DECEIT**

19 Plaintiff Susan Shalov ("Plaintiff"), on the one hand, and Defendants Mark Lane, Capitol  
20 Motion Pictures, LLC, Fully Attired Film Group, LLC, Fully Attired Film Group, LP and Full  
21 Circle Productions, LP (collectively, "Defendants"), on the other hand, by and through their  
22 counsel of record, enter into the following Stipulation Extending the Time for Defendants to  
23 Respond to Plaintiff's Complaint, with reference to the following facts:

24 A. Defendants were served with the Plaintiff's Complaint on March 11, 2010, and a  
25 response to the Complaint by the Defendants would otherwise be due on April 1, 2010.

26 B. Defendants retained counsel on March 26, 2010. As a result, Defendants require  
27 additional time to analyze the Plaintiff's contentions and formulate a response. The Plaintiff has  
28

1 agreed to provide the Defendants with an extension of time to respond to the Complaint, up to and  
2 including April 15, 2010.

3 NOW, THEREFORE, the parties hereto agree as follows:

4 1. Defendants, and each of them, may have up to and including April 15, 2010, to  
5 respond to the Plaintiff's Complaint.

6 2. This Stipulation may be executed in counterparts and via facsimile or other means  
7 of electronic transmission which, when taken together, shall constitute a single, signed original.

8 IT IS SO STIPULATED.  
9  
10

11 Dated: March 29, 2010

WERTZ McDADE WALLACE MOOT & BROWER  
A Professional Corporation

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13  
14 By: s/ Amberlynn Deaton  
15 Amberlynn K. Deaton  
16 Attorneys for Defendants Mark Lane, Capitol  
17 Motion Pictures, LLC, Fully Attired Film Group,  
18 LLC, Fully Attired Film Group, LP and Full  
19 Circle Productions, LP  
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21 Dated: March \_\_, 2010  
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By: s/ Bryan Pease  
Bryan Pease  
Attorneys for Defendants Mark Lane, Capitol  
Motion Pictures, LLC, Fully Attired Film Group,  
LLC, Fully Attired Film Group, LP and Full  
Circle Productions, LP

**ORDER**

Defendants, and each of them, may have up to and including April 15, 2010, to respond to the Plaintiff's Complaint.

DATED: March \_\_\_\_, 2010

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Hon. Marilyn Huff

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 29, 2010, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Southern District of California by using the CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

s/ Amberlynn Deaton

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